

Crawford, Kristie

From: Ryan Keane <ryan@keanelawllc.com>
Sent: Wednesday, October 9, 2024 5:19 PM
To: Crawford, Kristie
Cc: tanner@keanelawllc.com; matt@cliffordsaviolaw.com; nick@cliffordsaviolaw.com; Greenwood, Kelly
Subject: Re: Francis v. Wausau Homes, et al. [BJPC-BJLIB.FID2157956]

CAUTION: External Sender

Confirmed.

On Oct 9, 2024, at 5:18 PM, Crawford, Kristie <kcrawford@bjpc.com> wrote:

Ryan,

I can agree to that. Please confirm that we have an agreement as outlined below so that I can notify the court reporter that the deposition is postponed.

Thank you,

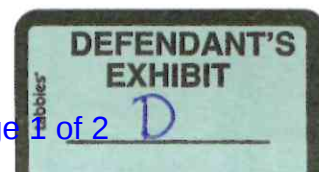
Kristie

Kristie Crawford | Principal
300 John Q. Hammons Parkway, Suite 603
Springfield, MO 65806
417-831-1412
kcrawford@bjpc.com
Website | Bio

From: ryan@keanelawllc.com <ryan@keanelawllc.com>
Sent: Wednesday, October 9, 2024 5:14 PM
To: Crawford, Kristie <kcrawford@bjpc.com>
Cc: tanner@keanelawllc.com; matt@cliffordsaviolaw.com; nick@cliffordsaviolaw.com; Greenwood, Kelly <kgreenwood@bjpc.com>
Subject: RE: Francis v. Wausau Homes, et al. [BJPC-BJLIB.FID2157956]

CAUTION: External Sender

Hi Kristie, that is fine – so long as we can agree that all other deadlines are reset to accommodate this 3 month extension and the second mediation.



Thanks,
Ryan

From: Crawford, Kristie <kcrawford@bjpc.com>
Sent: Wednesday, October 9, 2024 4:15 PM
To: ryan@keanelawllc.com
Cc: tanner@keanelawllc.com; matt@cliffordsaviolaw.com; nick@cliffordsaviolaw.com; Greenwood, Kelly <kgreenwood@bjpc.com>
Subject: Francis v. Wausau Homes, et al. [BJPC-BJLIB.FID2157956]

Ryan,

I still need to check with one person; however, **if** that person agrees, we are agreeable to postponing Christopher Wilkens, P.E.'s deposition to allow time for him to prepare his supplemental report and be properly disclosed as a retained expert if (1) Plaintiffs will pay any cancellation fee charged by the court reporter; and (2) Plaintiffs will join in a motion to amend the scheduling order to give Wausau Homes three months after receiving Wilkens' supplemental report to designate its expert witnesses. We are requesting three months to hopefully allow time for a second mediation before Wausau Homes' experts must be disclosed. Please let me know your thoughts on this proposal.

Thank you,

Kristie

Kristie Crawford | Principal
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